

From: Rand Crafts
To: mradulov@deq.state.ut.us
Date: Thursday, November 01, 2001 11:08:38 AM
Subject: Draft AO - IPSC Uprate

Milka,

Our suggestions & comments:

Page 11, in the PTE chart, the new PTE for PM10 should be 3,286.90 rather than 3,86.70, with zero increase in emissions.

On Page 12, where we discussed the term "demistifier," maybe we should use "mist eliminator."

Page 16, Condition 9, the current limit for SO2 is 0.15 lbs/mmbtu.

On page 19, in the new condition 12, it has indicated a Plant-Wide limit, but the calculation shown is only for the main boilers. Different types of factors are used for other equipment, such as diesel engines and aux boilers. A more generic way to discuss this would be to use the same language found in the engineering review at the top of Page 6: "Calculated using acceptable engineering judgement, emission factors, and fuel analyses, as appropriate."

We've had some serious discussion here concerning how to comply with Condition 24, on Page 21. We can accept the requirement for a rolling 12 month period, however we ask that the rolling 12 month period be formerly documented quarterly in regards to compliance. The reason for this is tied directly to the CEM program and how it works. Since compliance with Condition 24 is predicated on data from the CEM, our request is valid. The reason is that, although the system is certified accurate, the data itself is quality assured quarterly as part of the EDR submission process. We do not want to be put into a situation that compliance is based upon non-QA'd data if compiled monthly. Therefore, we recommend the language in Condition 24 read something like "....the rolling 12-month period, compiled quarterly, of the boilers 1 & 2.....".

Also, in Condition 24, there is a thorough discussion on how compliance will be determined using CEM data, testing, and emission factors. Since the specifics of these are AO conditions in and of themselves, we believe it would be more useful to refer to those conditions rather than to repeat portions of them within Condition 24. The reason is that in a compliance situation, it may appear to be a separate and distinct Condition concerning the use of CEM, testing, and calculated data, and could be a cause for an additional permit violation if a data condition is not met. We believe the DAQ is not intending to cause a redundant and separate Condition that could cause an additional fine. We therefore suggest that the language in Condition 24 read something like: "Compliance with this condition will be based upon data collected by required monitoring as required in other conditions of this Approval Order."

And lastly, the PTE table on Page 22 again show 3,86.70 tons for PM10.

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